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                             UNITED STATES DISTRICT COURT
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                           NORTHERN DISTRICT OF CALIFORNIA
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                                 SAN FRANCISCO DIVISION
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    UNITED STATES OF AMERICA ex rel.
                                                 CASE NO. C-11-0941 EMC
    CAMPIE,
17
                                                 DECLARATION OF LEONARD RUSSO
          Plaintiff and Relator,
                                                 IN SUPPORT OF THE UNITED STATES'
18
                                                 MOTION TO DISMISS RELATOR'S
                                                 SECOND AMENDED COMPLAINT;
          v.
19
    GILEAD SCIS., INC.,
                                                 Date: June 20, 2019
20
                                                 Time: 1:30 p.m.
                                                 The Honorable Edward M. Chen
           Defendant.
21
                                                 Courtroom 5, 17th Floor
22
                            DECLARATION OF LEONARD RUSSO
23
          I, Leonard Russo, declare:
24
                 I am a Special Agent at the United States Department of Health and Human
           1.
25
    Services, Office of Inspector General. After Relators filed this action in 2010, I participated in
26
    an investigation of Gilead Sciences, Inc. Based on my participation in the investigation and my
27
    review of documents relating to the investigation, I have personal knowledge of the matters set
28
    forth herein.
    U.S. MOTION TO DISMISS; MEMORANDUM OF POINTS AND AUTHORITIES
    Case No. C 11-0941-EMC
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- After this action was filed, the government investigated Relators' allegations for 2. over two years. The government reviewed Relators' complaint and amended complaints, their disclosure statement, and the accompanying materials. The government interviewed the Relators. The investigative team consulted with experts from the Department of Health and Human Services, including the Food and Drug Administration. The government met with counsel for Gilead on multiple occasions to discuss the allegations. The government collected over 600,000 pages of documents related to the allegations and interviewed numerous witnesses.
- The government also selected multiple manufacturing lots for which Relators had 3. alleged specific and potentially serious problems and obtained a complete review of the history of the lots from "cradle to grave," which accounted for the disposition of each lot with supporting documentation.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on March 27, 2019 in Seattle, Washington.

Leonard Juna SPECIAL AGENT LEONARD RUSSO